

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ASSOCIATION OF FLIGHT
ATTENDANTS-CWA, AFL-CIO,

Plaintiff,

v.

PENSION BENEFIT GUARANTY
CORPORATION,

Defendant.

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) Civil Action No. 1:05CV01036
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**UNOPPOSED MOTION TO FILE UNDER SEAL UNREDACTED
VERSION OF PLAINTIFF'S SUMMARY JUDGMENT MOTION**

Plaintiff Association of Flight Attendants-CWA, AFL-CIO ("AFA"), hereby moves the Court to authorize AFA to file an unredacted version of its summary judgment motion under seal.

By orders dated July 26, 2005 and September 27, 2005, the Court authorized Defendant Pension Benefit Guaranty Corporation ("PBGC") to file portions of the administrative record in this case under seal. AFA intends to rely upon portions of the sealed record in its motion for summary judgment to be filed on October 24, 2005. In keeping with the Court's prior seal orders, AFA intends to file publically a redacted version of its summary judgment motion without references to the sealed portions of the record, and file under seal an unredacted version of the pleading. Counsel for PBGC has indicated that the Agency does not oppose this motion.

Accordingly, AFA requests an order from the Court authorizing it to file under seal the unredacted version of its summary judgment motion.

Respectfully submitted,

/s/ Robert S. Clayman

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Dated: October 21, 2005 Counsel for Association of Flight
Attendants-CWA, AFL-CIO

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 21, 2005, I electronically filed Plaintiff's Unopposed Motion to File Under Seal Unredacted Version of Plaintiff's Summary Judgment Motion using the CM/ECF system. I further certify that on October 21, 2005, a true and correct copy of the same was served by electronic mail on:

Jeffrey B. Cohen
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Attorney for defendant PBGC

/s/ Robert S. Clayman
Robert S. Clayman